SECTION 11 - ASBESTOS MANAGEMENT

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11 ASBESTOS MANAGEMENT

Synopsis

The purpose of this section is to provide guidelines for employees and supervisors who work in or around asbestos-containing material or are responsible for removal and disposal of this material. The section applies to all NWS facilities, work sites and employees.

Initial Implementation Requirements:

- **Review National Weather Service Manual 50-1115 Occupational Safety and Health,** Section 31 Asbestos Safety
- **C** Analyze Site Operations versus Requirements of the Procedure
 - S Identify all sites where an asbestos hazard may be present (NWSM 50-1115, 31.3.3)
 - **S** Perform Visual Inspection and Instrumental Testing of "suspect" ACMs. (NWSM 50-1115, 31.3.3)
- C Designate Person to Administer the Asbestos Safety Procedure Requirements (if required)
- C Develop/Obtain Documentation/Information Required for Site
 - S Develop an Asbestos Control Program (NWSM 50-1115, 31.3.3) (if applicable)
- C Provide Local Training of Site Personnel (if required)
- C Develop an Asbestos Removal Plan (if applicable)
- Contract with an EPA-approved Asbestos Removal Contractor if ACM is present
- Manage the removed material as per the State and Federal requirements (if applicable)

Recurring and Annual Task Requirements:

Until the ACM is removed:

- **C** Perform Inspection/Assessment/Testing
 - **S** Perform Visual Inspection and Instrumental Testing of "suspect" ACMs. (*NWSM 50-1115, 31.3.3*) as necessary
- **C** Review/Update Documentation/Information required for Site
 - Maintain Asbestos Control Program. (NWSM 50-1115, 31.3.3) (if applicable)
- C Provide Refresher Training of Site Personnel (if required)

Checklist

11 Asbestos	YES	NO	N/A
1. Does the facility or work site have or is it suspected to have asbestos or asbestos-containing material? (11.5.1)			
a. If yes, has testing been performed? (11.5.1)			
2. If asbestos was found, has an Asbestos Control Program been established? (11.5.2)			
a. Has an Asbestos Control Program Coordinator been appointed?(11.5.2)			
b. Have all affected employees been notified in writing of the presence of asbestos? $(11.5.2a)$			
c. Have "regulated areas" been established? (11.5.2d)			
d. Are all NWS personnel prohibited from entering the prohibited areas? $(11.5.2e)$			
e. Are there plans to remove the asbestos? (11.6)			
f. Has a plan been filed with the EPA Regional Office? (11.6.1)			
g. Has a formal file to record all activities been created? (11.6.2)			
h. Are all records pertaining to asbestos removal retained on-site for at least 2 years? $(11.6.2)$			
i. Has or will the removed asbestos material be disposed at an approved facility? (11.6.3)			

11 ASBESTOS MANAGEMENT

11.1 Purpose and Scope

While the NWS has attempted to remove asbestos from the workplace, because of the pervasive use of this material in building construction, it is possible that asbestos-containing material may still be found at some NWS facilities and work sites. To ensure NWS personnel are protected from this material during its use, removal and disposal, this section has been created.

The section applies to all NWS facilities where asbestos or asbestos-containing material are known or assumed to be present.

11.2 **Definitions**

<u>Friable Asbestos</u> - is any material that contains more than 1 percent asbestos that, when dry, can be crumbled, pulverized or reduced to powder by hand pressure. Examples of friable asbestos include spray-on insulation and pipe insulation.

<u>Non-Friable Asbestos</u> - is a material containing more than 1 percent asbestos that cannot be crumbled, pulverized or reduced to powder by hand pressure. Vinyl asbestos floor tile or uncracked transite are examples of non-friable asbestos.

Regulated Asbestos-Containing Materials (RACM) - means (a) Friable asbestos material, (b) Category I non-friable ACM that has become friable, (c) Category I non-friable ACM that will be or has been subjected to sanding, grinding, cutting or abrading, or (d) Category II non-friable ACM that has a high probability of becoming or has become crumbled, pulverized or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations.

11.3 Acronyms Employed in This Section

ACM - Asbestos-Containing Material
CIH - Certified Industrial Hygienist
EPA - Environmental Protection Agency

NOAA - National Oceanic & Atmospheric Administration

NWS - National Weather Service

NWSH - National Weather Service Headquarters

OSHA - Occupational Safety and Health Administration

PEL - Permissible Exposure Limit

RACM - Regulated Asbestos-Containing Material
RECO - Regional Environmental Compliance Officer

RSM - Regional Safety Manager TWA - Time Weighted Average WSR - Waste Shipment Record

11.4 Regulatory Requirements

11.4.1 Federal Laws and Regulations

a. Occupational Safety & Health Administration (OSHA)

The Occupational Safety & Health Administration (OSHA) regulates asbestos in all industries other than construction, ship repair and shipbuilding, in 29 CFR 1910.1001.

b. Environmental Protection Agency (EPA)

The Environmental Protection Agency (EPA) regulates asbestos emissions, removal and disposal under 40 CFR Part 61 - The National Emissions Standards for Hazardous Air Pollutants, Subparts A (40 CFR Parts 61.01 to 61.19) and M (40 CFR140-157 and Appendix A to M).

c. National Weather Service (NWS)

The National Weather Service (NWS) asbestos control program is detailed in National Weather Service Manual 50-1115 Occupational Safety and Health, Section 31 - Asbestos Safety.

11.5 Asbestos Control Program

11.5.1 <u>Identification of Asbestos-Containing Material (ACM)</u>

The EPA and OSHA define two types of asbestos - friable and non-friable.

Friable asbestos material is any material that contains more than 1 percent asbestos that, when dry, can be crumbled, pulverized or reduced to powder by hand pressure. Examples of friable asbestos include spray-on insulation and pipe insulation.

Non-friable asbestos is a material containing more than 1 percent asbestos that cannot be crumbled, pulverized or reduced to powder by hand pressure. Vinyl asbestos floor tile or uncracked transite are examples of non-friable asbestos.

The EPA further divides non-friable asbestos into two categories - I and II.

Category I non-friable asbestos-containing material includes asbestos-containing packings, gaskets, resilient floor covering and asphalt roofing products containing more than 1% asbestos.

Category II non-friable asbestos-containing material is any material other than a Category I ACM that contains more than 1% asbestos that when dry, cannot be crumbled, pulverized or reduced to powder by hand pressure.

While the continued use and removal of both friable and non-friable asbestos are regulated, because of the obvious threat to the air, both the EPA and OSHA require more control of friable asbestos-containing materials to ensure the asbestos remains contained.

National Weather Service Manual 50-1115, Occupational Safety and Health - Section 31 - Asbestos Safety requires in 31.3.3 that "NWS facilities where asbestos or ACM are potentially present (e.g. buildings and structures built before 1981), shall arrange visual inspections and testing of "suspect" materials by an accredited inspector or Certified Industrial Hygienist (CIH) who has completed an EPA-approved asbestos training course. This effort will be coordinated with NOAA Regional Environmental Compliance Officers (RECOs), NOAA Regional Safety Managers (RSMs) and NWS Regional Environmental/Safety Coordinators."

11.5.2 Establish an Asbestos Control Program

NWSM 50-1115, 31-3.3 requires that, "When presence of asbestos or ACM is confirmed, an Asbestos Control Program shall be established and maintained with RECOs and/or RSMs."

This program includes:

- a. Designation of an Asbestos Control Program Coordinator by the Facility Manager to coordinate the facility efforts.
- b. The notification of all affected employees of any asbestos monitoring within 15-days of receipt by the NWS facility or work site. This notification must be in writing and it can be made individually or by posting of the results in a location accessible to all employees.
- c. The notification of all affected employees of the procedures taken to minimize exposure.

- d. If airborne concentrations of asbestos or presumed asbestos material are in excess of the OSHA Permissible Exposure Limit (PEL) on a Time Weighted Average (TWA), a "regulated area" must be established, clearly demarcated and access limited.
- e. Persons entering the regulated area must use an appropriate respirator and be trained and certified in its use.
- f. All employees are prohibited from eating, drinking, smoking, chewing tobacco or gum or applying cosmetics in the regulated area.

11.6 Asbestos Removal Plan

In consultation with the NWS Regional Environmental/Safety Coordinator, the NOAA Regional Environmental Compliance Officer (RECO) and/or the NOAA Regional Safety Manager, the decision will be made whether to:

- a. allow the asbestos or ACM to remain in its current state
- b. encapsulate it, or
- c. remove it.

If removal is decided, an asbestos removal plan must be prepared which includes:

- a. Notification of the EPA Regional Office and the receipt of a written approval prior to initiation of the removal.
- b. Establishing and maintaining a formal file to record all activities.
- c. A description of the procedures to be employed to remove the asbestos or ACM while preventing contamination to the rest of the facility.
- d. Disposal at an approved facility.

11.6.1 Notification

Depending on the amount, type and location of the asbestos or asbestos-containing material, the Regional Office of the Environmental Protection Agency (EPA) may require a notification prior to initiating the removal of the material. The requirements for when this notification is required are detailed in 40 CFR 61.145. Contact the NOAA Regional Environmental Compliance Officer (RECO) and/or Regional Safety Manager (RSM) for assistance in both determining if the notification is required and preparing the notice.

The notification must be received by the EPA at least 10 working days before the start of the asbestos removal and must include a description of the analytical procedures used to identify the material, the removal techniques to be used, the location of the material, the starting and completion dates, the name and location of the disposal site and a certification that the operation will be supervised by an EPA-certified Asbestos Supervisor.

Upon review by the EPA, the Regional Administrator will provide a written approval for the asbestos abatement project. This approval must be kept at the work site during the operation.

To assist in understanding and complying with the notification requirements, the EPA has created a website to explain what is required and when. The web address is: www.epa.gov/region04/air/asbestos/asbqa.htm.

Note: The States can impose more stringent requirements for managing, reporting and notifying of a removal project. Contact the Regional Environmental Coordinator, NOAA Regional Environmental Coordinator (RECO) or Regional Safety Manager (RSM) for more specific information.

11.6.2 Recordkeeping

A copy of the EPA notification, the EPA Regional Administrator's approval, the shipping paper [waste shipment record (WSR)] and the disposal site confirmation will be provided to the NWS Regional Environmental /Safety Coordinator and the NOAA Regional Environmental Compliance Officer (RECO). The records must be kept on-site for at least two (2) years, however, it is highly recommended that these records be kept permanently.

11.6.3 <u>Disposal</u>

Prior to disposal, all asbestos and asbestos-containing materials must be wetted to minimize the release of air particles and then placed in a leak tight wrapping which is then placed into another leak tight wrapping (this is also known as double-bagging).

In general, wetted, double-bagged asbestos can be disposed in a State-approved solid waste facility. Prior contact with both the disposal facility and the State by the NWS Regional Coordinator or NOAA RECO will assure all local ordinances are known and followed.

11.7 Responsibilities

11.7.1 NWS Headquarters (NWSH)

- a. The NWS Environmental/Safety Office shall perform an annual assessment of the NWSH facilities to ensure that the facilities are in compliance with this section.
- b. The NWSH Environmental/Safety Office shall periodically perform an assessment of the regional headquarters and field offices to ensure compliance with this section. The frequency of these regional and field office assessments shall be determined by the NWSH Environmental/Safety Office.
- c. Requests for clarification concerning this section shall be directed to the NWSH Environmental/Safety Office.

11.7.2 Regional or Operating Unit Environmental/Safety Coordinator

- a. Shall monitor and coordinate to ensure compliance with the requirements of this section by the regional headquarters, field offices or operating units.
- Shall perform an annual assessment of the regional headquarters facilities or operating unit to monitor and promote compliance with the requirements of this section.
- c. Shall perform assessments or designate personnel to perform assessments of all field offices to monitor and promote compliance with the requirements of the section every two years.

11.7.3 Station Manager

- a. Shall have oversight over the implementation of this section and ensure that the requirements of this section are followed by individuals at the NWS facility.
- b. Shall ensure sufficient personnel and funding are available to enable compliance with all applicable requirements of this section.
- c. Shall ensure that an asbestos control program is developed at NWS field offices containing asbestos materials.
- d. Shall ensure NWS employees follow the requirements of this section.

e. Shall review or delegate review of this section on an annual basis to ensure that the facility is complying with its requirements. Confirmation of this review shall be forwarded to the Regional or Operating Unit Environmental/Safety Coordinator.

11.7.3 Environmental or Environmental/Safety Focal Point or Asbestos Control Program Coordinator

a. Shall ensure any tasks delegated to them by the Station Manager are implemented in accordance with the requirements of this section.

11.7.4 Employees

- a. Individual employees affected by this section are required to read, understand and comply with the requirements of this section.
- b. Report all violations of the requirements of this section to their supervisor or Environmental Focal Point.

11.8 References

<u>Incorporated References</u>

The following list of references is incorporated as a whole or in part into this section. These references can provide additional explanation or guidance for the implementation of this section.

- 11.8.1 Department of Labor Occupational Safety and Health Administration, 20 CFR 1910.1001, "Asbestos"
- 11.8.2 U.S. Environmental Protection Agency
 - 40 CFR 61, National Emission Standards for Hazardous Air Pollutants, Subpart M, "Asbestos"
 - 40 CFR 61.145, Standard for Demolition and Renovation
- 11.8.3 National Weather Service Manual 50-1115, <u>Occupational Health and Safety</u>, Section 31